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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JORGE ABRAMOVS,

Defendant.

2:21-CR-027-RFB-DJA

**United States of America's Motion to
Approve Listing Price for Real Property
Located at 3726 South Las Vegas
Boulevard, Unit 1803, Las Vegas, Nevada**

Motion and Memorandum of Points and Authorities

The United States of America (United States) moves this Court to approve a listing sale price of \$480,000 for Real Property Located at 3726 South Las Vegas Boulevard, Unit 1803, Las Vegas, Clark County, (Unit 1803):

MORE PARTICULARLY DESCRIBED AS:

PARCEL I:

UNIT ONE THOUSAND EIGHT HUNDRED THREE (1803) IN BUILDING "W" IN VEER TOWERS, AS SHOWN ON THAT CERTAIN FINAL MAP OF THE VEER TOWERS, A RESORT CONDOMINIUM SUBDIVISION ON FILE IN BOOK 142 OF PLATS, PAGE 42 (THE "MAP") AND AS SET FORTH IN THE DECLARATION OF COVENANTS, CONDITIONS AND RESTRICTIONS AND RESERVATION OF EASEMENTS FOR VEER TOWERS (THE "DECLARATION"), RECORDED MAY 03, 2010 IN BOOK 20100503 AS INSTRUMENT NO. 0002036, BOTH IN THE OFFICE OF THE COUNTY RECORDER, CLARK COUNTY, NEVADA (THE "OFFICIAL RECORDS").

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1 PARCEL II:

2 AN ALLOCATED INTEREST AS A TENANT-IN-COMMON IN THE
3 COMMON ELEMENTS OF VEER TOWERS (INCLUDING ANY
4 ANNEXATIONS THEREOF)AS SHOWN BY THE MAP AND AS SET
5 FORTH IN THE DECLARTION.

6 PARCEL III:

7 AN EXCLUSIVE EASEMENT APPURTENANT TO PARCELS ONE (1)
8 AND TWO (2) DESCRIBED ABOVE, OVER AREAS DEFINED AND
9 DESCRIBED AS LIMITED COMMON ELEMENTS, IF ANY,
10 ALLOCATED TO PARCELS ONE (1) AND TWO (2) IN THE
11 DECLARATION AND AD SHOWN AND DELINEATED UPON THE
12 MAP REFFERED TO ABOVE.

13 PARCEL IV:

14 NON-EXCLUSIVE EASEMENTS FOR ACCESS, INGRESS, EGRESS,
15 USE AND OTHER PURPOSES ALL DESCRIBED IN THE
16 DECLARATION AND IN THAT CERTAIN (A) DECLARTION OF
17 CENTRAL PLANT EASEMENTS, DATED DECEMBER 01, 2009 AND
18 RECORDED DECEMBER 1, 2009 IN BOOK 20091201 AS
19 INSTRUMENT NO. 0002884 OF OFFICIAL RECORDS, AND AS
20 AMENDED BY THAT CERTAIN FIRST AMENDMENT TO
21 DECLARATION OF CENTRAL PLANT EASEMENTS, DATED
22 JANUARY 7, 2010 AND RECORDED JANUARY 7, 2010 IN BOOK
23 20100107 AS INSTRUMENT NO. 0000577 OF OFFICIAL RECORDS; (B)
24 PARKING AND ACCESS AGREEMENT, DATED APRIL 28, 2010 AND
25 RECORDED MAY 3, 2010 IN BOOK 20100503 AS INSTRMENT NO.
26 0000515 OF OFFICIAL RECORDS; (C) DECLARATION OF SUPPORT
27 AND ENCROACHMENT EASEMENTS, DATED DECEMBER 1, 2009
28 AND RECORDED DECEMBER 1, 2009 IN BOOK 20091201 AS
INSTRUMENT NO. 0002885 OF OFFICIAL RECORDS, AND AS
AMENDED BY THAT CERTAIN FIRST AMENDMENT TO
DECLARATION OF SUPPORT AND ENCROACHMENT
EASEMENTS, DATED JANUARY 7, 2010 AND RECORDED
JANUARY 07, 2010 IN BOOK 20100107 AS INSTRUMENT NO. 0000578
OF OFFICIAL RECORDS; AND (D) DECLARATION OF LIFE SAFETY
SYSTEMS EASEMENTS, DATED DECEMBER 1, 2009 AND
RECORDED DECEMBER 1, 2009 IN BOOK 20091201 AS
INSTRUMENT NO. 0002886 OF OFFICIAL RECORDS, AND AS
AMENDED BY THAT CERTAIN FIRST AMENDMENT TO
DECLARATION OF LIFE SAFETY SYSTEM EASEMENTS DATED
JANUARY 7, 2010 AND RECORDED JANUARY 07, 2010 IN BOOK
20100107 AS INSTRUMENT NO. 0000579, AND ALL IMPROVEMENTS
AND APPURTENANCES THEREON, APN: 162-20-714-153.

25 On November 12, 2021, this Court authorized the Interlocutory Sale of Unit 1803.
26 Order Approving Interlocutory Sale, ECF No. 56. The Interlocutory Sale was not opposed
27 by Defendant. ECF No. 56. Following the Court's Order, Douglas Sawyer (the Court-
28 approved broker) appraised the property and, based on recent sales, adjustments to the

1 recent sales to account for differences between the property and comparable properties, the
2 condition of the property, and the prevailing real estate market, opined that the property
3 was worth between \$480,000 and \$500,000. Mr. Sawyer has recommended a listing price of
4 \$480,000.¹

5 The United States recommends that this Court approve the recommended listing
6 price of \$480,000. The United States views this listing price as fair and reasonable based on
7 the information received from Douglas Sawyer and the most recent comparable sales.

8 Respectfully submitted this 2nd day of March 2022.

9 CHRISTOPHER CHIOU
10 Acting United States Attorney

11 /s/ James A. Blum
12 JAMES A. BLUM
13 Assistant United States Attorney

14
15 IT IS SO ORDERED:

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17 RICHARD F. BOULWARE, II
18 UNITED STATES DISTRICT JUDGE

19 DATED: April 29, 2022
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28 ¹ On February 25, 2022, the Defendant agreed to the sale price of \$480,000 through his
counsel, Maggie Lambrose.